

LAW OFFICES OF DALE K. GALIPO

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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA SALAS
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISAAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA; ROBERT
VACCARI; JAKE ADAMS; and DOES
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

NOTICE OF SETTLEMENT

**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS
OF RECORD:**

PLEASE TAKE NOTICE that Plaintiffs L.C., a minor by and through her guardian *ad litem* Maria Cadena; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez; and A.L., a minor by and through her guardian *ad litem* Lydia Lopez (“Plaintiffs”) and Defendants State of California, by and through the California Highway Patrol, Michael Blackwood, Isaiah Kee, and Bernardo Rubalcava (“State Defendants”) (collectively “the Parties”), by and through their respective attorneys of record, have reached a settlement of all claims.

The Parties request that the current trial date be vacated as well as any remaining pretrial requirements. Plaintiffs intend to file petitions for approval of the minors’ compromise with the Court in light of the settlement of the action. The Parties have agreed that Plaintiffs may file the petition for approval of the minors’ compromises *ex parte* and unopposed. Once the minors’ compromises have been approved and Plaintiffs are in receipt of the settlement funds from State Defendants and County Defendants, the Parties will file a stipulation of dismissal with prejudice. The Parties further request that the Court retain jurisdiction over this matter to enforce the terms of the settlement.

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1 DATED: May 23, 2025

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3 Bv /s/ *Hang D. Le*

4 Dale K. Galipo
5 Hang D. Le
6 Attorneys for Plaintiffs

7 DATED: May 23, 2025

8 ROB BONTA
9 Attorney General of California
10 NORMAN D. MORRISON
11 Supervising Deputy Attorney General

12 /s/ *Diana Esquivel**

13 DIANA ESQUIVEL
14 Deputy Attorney General
15 *Attorneys for Defendant State of Cal., by and*
16 *through the CHP, Blackwood, Kee, and*
17 *Rubalcava*

18 *The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose
19 behalf the filing is submitted, concur with the filing's content and have authorized the
20 filing.
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